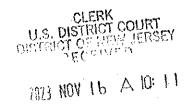
J.P.
255 Franklin Ave
Unit 104
Belleville, NJ 07109
973.449.1900
JimmypoL1@aol.com



November 16, 2023

Re: J.P. v. Strategic Delivery Solutions, et als. 22-cv-07614

Dear Judges Padin and Clark,

Plaintiff requests the Court's permission to file a sur-reply in opposition to defense counsel's misleading sur-reply.

Plaintiff's proposed sur-reply is annexed as Exhibit A.

Respectfully Submitted,

November 16, 2023

## EXHIBIT A

J.P.
255 Franklin Ave
Unit 104
Belleville, NJ 07109
973.449.1900
Jimmypo£1@aol.com

November 16, 2023

Re: J.P. v. Strategic Delivery Solutions, et als. 22-cv-07614

Dear Judges Padin and Clark,

Defense counsel is dishonest in his representation of "evidence contradicting plaintiff's representations, regarding the privacy and confidentiality of his medical condition, and diagnosis."

By defense counsel's own admission, plaintiff made it explicitly clear, in his present motion pleadings before the Court, that he was involved in a current suit against Google, for transmitting his protected health and disability information from government databases etc; essentially, the very information defense counsel has annexed in his sur-reply.

The cases annexed were filed with the Courts, without knowledge that they would appear on Google, to the public at large; hence the action against Google.

Defense counsel is well aware of this, and is attempting to mislead the Court in his sur-reply.

Plaintiff had a natural expectation that his name would be Googled in this instant matter, he actually stated it in his motion papers, nothing was hidden; as any reasonable person would agree.

There is a significant difference between protected health and disability information being stored on a Court's database, versus it being broadcasted on Google, simply by entering plaintiff's name. Defense counsel is wasting the Court's time, has inundated the Court with his myriad of papers; he will clearly do anything for billable hours, he is also frivolously using the Court to effect a pathetic scare tactic, while misleading the Court; all which offend the ethics of the Court; for these reasons, the Court should consider sanctions sua sponte.

As an "officer of the Court," he also fails to request sanctions by way of separate motion, as the Rules require - his behavior is quacky, and outside conformity of the Court's decorum and standards.

Separately, to date, the Court has granted three Orders within 24 hours of receiving electronic letter motions from defense, without permitting opposition from the plaintiff; who does not file electronically. Plaintiff requests an opportunity to respond going forward.

Last, plaintiff requests a 90 day stay of the instant matter, to secure counsel, also to receive and recover from surgery.

See Exhibit A-1

Should the Court prefer a formal motion to stay the proceeding, plaintiff will oblige.

Respectfully Submitted,

November 16, 2023

## **EXHIBIT A-1**



Tijuana, Baja California, November 3, 2023.

To whom it may concern:

Please allow this correspondence to confirm that Justin <u>James Polidoro born 02/24/1971</u>, must begin treatment as soon as possible for Stem cell therapy, The patient will fly into San Diego International airport and then begin Stem cell therapy at CHIPSA Hospital in Mexico on or before 1/10/2024 to 1/13/2024 at CHIPSA Hospital North Beach Clinic, located at <u>Avenida del Pacifico 497</u>, seccion Monumental, Playas de Tijuana, 22505 Tijuana, B.C., Mexico..

Thank you,

Should you have any concerns or questions regarding this matter, please contact me on the number below.

Thank you

Dr. Andrei Leon.

C.H.I.P.S.A. The Gerson Therapy HOSPITAL and Advanced Infinunotherapy

for Cancer

Phone: (888)667-3640

C.H.I.P.S.A. The Gerson Therapy Hospital and Advanced Immunotherapy Center for Cancer

Address: De Las Nubes 670, Playas, Playas de Tijuana, 22500 Tijuana, B.C.

Phone: +1 855 624 47 72